

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI**

Cindy I Young 87556 )  
(full name) (Register No.) )  
CCC 3151 Littou Rd 8-CRM134 )  
Chillicothe Correctional Center )  
Chillicothe, Mo 64601 )  
Plaintiff(s). )

Case No. \_\_\_\_\_

v. )

Greg Murphy, Chaplain )  
(Full name) )  
(see attached list) )  
Defendant(s). )

Defendants are sued in their (check one):

\_\_\_\_ Individual Capacity

\_\_\_\_ Official Capacity

\_\_\_\_ Both

**COMPLAINT UNDER THE CIVIL RIGHTS ACT OF 42 U.S.C. § 1983**

I. Place of present confinement of plaintiff(s): \_\_\_\_\_  
CCC 3151 Littou Rd Chillicothe, Mo 64601

II. Parties to this civil action:  
Please give your commitment name and any another name(s) you have used while incarcerated.

A. Plaintiff Cindy I Young Register No. 87556  
Address \_\_\_\_\_

B. Defendant Greg Murphy + staff members listed see attachment  
Is employed as Chaplain

For additional plaintiffs or defendants, provide above information in same format on a separate page.

## List of Plaintiff's

- ★ IRR's have been filed on Mr. Murphy
- ★ Myself - Cindy Young
- ★ Keyona Williams
- ★ Verdian Miller
- Debra Tullis
- ★ Esther Wadley
- ★ Monica McCarty
- ★ Margaret Hodges
- ★ "Gi Gi"/Glenda Grimes • on parole will testify
- Jennifer Landing or Lanning • on parole will testify

I - B  
Additional Defendants

1. COI Mr. Alexander
  2. COI Mr. Dysert
- > posted directly at the Chaplain's office, doorway in site of chapel office, all workers and activities, in ear shot and sight
- Was present at violent verbal screaming, told not to hire me, etc  
Worked the same location since all this began.

3. IRR resolution officers over these years in question.

4. Ms Simpson IAC, Patch, 4-H, SFTS, Scared Straight  
VIC approval, Fundraisers, (etc) Caroling  
Banquets, Food Drives,

Office is connected to the Chaplains area/office  
Friends with Chaplain Murphy, These offices interact  
and they intermingle, overlap and advise or support  
or harrass or punish offenders due to one others  
negative treatment or dislike or measured offense  
toward an offender(s) as a team or "brother  
hood" type retaliation with a high level of  
unprofessionalism + negative conduct or direct harm.

Have a list of directly affected offenders and  
seperate situations to present at trial

And a list of staff that know this and will  
testify.

1-B continued  
Doug Warsham Spiritual Programming  
Mr. Murphy's Supervisor  
Office in Jefferson City, Mo. 65102  
Po Box 236 573.526.6489

Covers up and allows or aids in this on-going behavior.

Has visited often, Seen IRR's and complaints received kites + letters from offenders has never once responded or found anything wrong with the on-going behavior, never addressed the rage, anger, exclusion of offenders in the groups or activities in any service or group that has complained, written or wrote IRR's never over viewed any of the inaccurate bookwork or counts of low attendance or that Mr. Murphy conducted services or kept groups out, or that changes in normal banquet routines or the ~~ex~~clusions of offenders in those venues were never properly monitored or were the cooked-books and fake counts that did direct harm to numerous offenders ever looked upon as I'm sure protocol allows for No fail safes or checks were maintained

III. Do your claims involve medical treatment? Yes \_\_\_\_\_ No ☒

IV. Do you request a jury trial? Yes ☒ No \_\_\_\_\_

V. Do you request money damages? Yes ☒ No \_\_\_\_\_

State the amount claimed?

\$ 250 K / 150 K (actual/punitive)

VI. Are the wrongs alleged in your complaint continuing to occur? Yes ☒ No \_\_\_\_\_  
*on each staff individual or officer or DOC. separately each year*

VII. Grievance procedures:

*plus on-going abuse + exclusion*

A. Does your institution have an administrative or grievance procedure?

Yes ☒ No \_\_\_\_\_

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution?

Yes ☒ No \_\_\_\_\_

C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

attached  
\_\_\_\_\_  
\_\_\_\_\_

D. If you have not filed a grievance, state the reasons.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

VIII. Previous civil actions:

A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case?

Yes \_\_\_\_\_ No ☒

B. Have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated?

Yes \_\_\_\_\_ No ☒

C. If your answer is "Yes," to either of the above questions, provide the following information for each case.

(1) Style: \_\_\_\_\_  
(Plaintiff) (Defendant)

(2) Date filed: \_\_\_\_\_

(3) Court where filed: \_\_\_\_\_

(4) Case Number and citation: \_\_\_\_\_

(5) Basic claim made: \_\_\_\_\_

(6) Date of disposition: \_\_\_\_\_

(7) Disposition: \_\_\_\_\_

(Pending) (on appeal) (resolved)

(8) If resolved, state whether for: \_\_\_\_\_

(Plaintiff or Defendant)

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim: Made my imprisonment more burdensome than the law allows  
Abuse of Authority Spiritual & Emotional Harm. Direct refusal  
of Christian General activities surrounding my expression of faith

A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

Since Chaplain Murphy has taken this position as chaplain he has continued  
to treat me and others with deliberate indifference all listed in this motion.  
I and the other women have followed proper procedure but the prison  
officials that could stop this have instead become a party to cover-up  
and allow Mr. Murphy to continue his direct harm and unprofessionalism  
He has displayed wild rage, violent behavior and staff have witnessed  
this numerous times and were present on many occasions. And in fact  
these staff members have went to great lengths to cover for him and  
have not used designated reporting to stop any of this when it is  
mandatory to do so and instead turn a blind eye or join in with their  
own co-conspiracy or extend his directives of additional abuse on us

B. State briefly your legal theory or cite appropriate authority:

Campaign of harrasment with in the staff "brotherhood" mentality

Deliberate indifference, failure to respond + on many occasions encouraged  
psychological abuse. Guards, officers, staff in the same direct areas should  
have taken action instead of disregarding the risk of my safety or others

Causation. Chaplain Murphy meets, greets privately hires offenders he can prey upon  
or groom into doing unethical things looks for certain types of women  
to privately counsel, work, etc. Creates make believe positions for  
workers that submit even ones who by the institutional rules were to  
change positions, or has a job, but "works" for him. This will be direct  
testimony at trial and past workers, and witnesses who will verify.

(3) Court where filed: \_\_\_\_\_

(4) Case Number and citation: \_\_\_\_\_

(5) Basic claim made: \_\_\_\_\_

(6) Date of disposition: \_\_\_\_\_

(7) Disposition: \_\_\_\_\_

(Pending) (on appeal) (resolved)

(8) If resolved, state whether for: \_\_\_\_\_

(Plaintiff or Defendant)

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim: Abuse of Authority! Spiritual Harm & Expression and refusal of Christian General activities surrounding my religion + expression made my imprisonment more burdensome than the law allows.

A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

Since Chaplain Murphy has taken this position as chaplain he has treated me and others deliberate indifference to me + the other offenders listed herein. I have notified by record + due process the prison officials that could stop this for redress of our grievances of our 1st, 5th and 14th Amendment rights. By doing this nothing has changed and in fact direct retaliation + harm has instead occurred to each of us. As well as an extended protected conduct of harm by others surrounding the Chaplain which has caused us to experience a campaign of harassment and a cover up of the Chaplain's conduct of threats, rage, violent behavior and failure to report this to their immediate supervisors when such a process is in place to report this abuse. When they themselves were present during verbal assaults, threats + humiliations in public -

COI B. State briefly your legal theory or cite appropriate authority: "Campaign of harassment and fellow co-worker brotherhood mentality"  
Mr. Alexander - Deliberate indifference, failure to respond + in fact encouraged psychological abuse. Guard, staff should have taken action instead of disregarding the risk of my safety. Causation. Kept from a porter job see attached job change  
Mr. Dysert - Additional harassment from fellow co-worker + friend + forced us to have contact with the Chaplain in non-spiritual groups without prior knowledge  
Ms Simpson - Stand for The Silent Banquet, Christmas Caroling rehearsals, etc. Withholding SFTS fundraiser item to punish me directly. And leaving me off of her docket, voting and Banquet to punish me at Mr. Murphy's request - She backs his treatment of us and has gone out of her way to punish me further to cause even more direct harm and harassment there's a current situation Ms Herring can tell you about as well as Mr. Anderson case worker on 7H. who is just now trying to stop her harassment by my filing a current IRR at Ms Herring's request via Mr. Anderson. IRR # CCC 17-905.  
IAC, SFTS -

III. Do your claims involve medical treatment? Yes \_\_\_\_\_ No X

IV. Do you request a jury trial? Yes X No \_\_\_\_\_

V. Do you request money damages? Yes X No \_\_\_\_\_

State the amount claimed?

\$250<sup>+</sup>K / 150<sup>+</sup>K (actual/punitive)  
each individual officer or staff

VI. Are the wrongs alleged in your complaint continuing to occur? Yes X No \_\_\_\_\_

VII. Grievance procedures: Mrs Ireland who allows this when we have all  
she allows this to continue over & over! complained + filed IRR

A. Does your institution have an administrative or grievance procedure?

Yes X No \_\_\_\_\_

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution?

Yes X No \_\_\_\_\_

C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

\*numerous: CCC-14-770 conducting services + forcing our attendances  
keeping us from: Job, choir, Banquets, weekend events, nominations positions  
in service: decoration committee, Baptisms, Visser, Greeter, Speaker, facilitator, etc  
CCC 14-734 Placing me + others in the hole. See others grievances + IRRs

D. If you have not filed a grievance, state the reasons. Warden after Warden  
other times I've dropped kites to the Acting Warden Mrs Herring  
who investigated or transferred the complaint/situations to the FOM  
Mrs Packey 7th, or to the in house investigators or to the Warden(s) and  
directly to the main office in Jefferson City to Doug Warsham Chaplain Murphy

VIII. Previous civil actions: direct Boss in Spiritual Services (who covers up for him)

A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case?

Yes \_\_\_\_\_ No X

B. Have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated?

Yes \_\_\_\_\_ No X

C. If your answer is "Yes," to either of the above questions, provide the following information for each case.

(1) Style: \_\_\_\_\_  
(Plaintiff) (Defendant)

(2) Date filed: \_\_\_\_\_



- X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments.  
To allow me to express as anyone else areas of praise and worship  
and service and fellowship to my Lord and Savior as allowed in the  
Christian General capacities. To compensate and relieve my pain  
and spiritual suffering and humiliation and <sup>limitation of</sup> expression of my Christian
- XI. Counsel: faith. To stop the treatment + harassment I have suffered for years  
now by his co-workers + friends who harm + harass me + others  
because of our IRLs. + now we are treated differently purposefully as  
A. If someone other than a lawyer is assisting you in preparing this case, state the person's name. no sport.

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes \_\_\_\_\_ No ☒

If your answer is "Yes," state the names(s) and address(es) of each lawyer contacted.

C. Have you previously had a lawyer representing you in a civil action in this court? Yes \_\_\_\_\_ No ☒

If your answer is "Yes," state the name and address of the lawyer.

**I declare under penalty of perjury that the foregoing is true and correct.**

Executed (signed) this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_.

Cindy Young  
Signature(s) of Plaintiff(s)

Mr Alexander COI. Held the Door for me to escape Chaplain Murphys Rage + Verbal assault that could be heard in the Barber shop where COI Jarvis (UH) heard it. Mr Alexander had to intervene + call my job because the Chaplain was holding me "hostage" screaming and ranting that they could hate him down at the office - captians. So he got Murphy to let up on me so they other officers wouldnt show up. Protects the Chaplain when he has certain offenders in his office unharrassed + unusual hours -

- X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments. hours -  
90 day Preliminary TRO from Murphy, Dyserf, Alexander, Simpson from the area. They work Rec/Chapel area to keep direct harm from myself + all the others  
Compensatory Damages from Cruel + Unusual Punishment. For me to be allowed to sing in the choir as my right to worship. Punitive Relief on the guilty parties  
XI. Counsel: that caused deliberate indifference + aided + protected Murphy. For Murphy to be fired or suspended until court.

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name. no

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes      No X

If your answer is "Yes," state the names(s) and address(es) of each lawyer contacted.

C. Have you previously had a lawyer representing you in a civil action in this court? Yes      No X

If your answer is "Yes," state the name and address of the lawyer.

**I declare under penalty of perjury that the foregoing is true and correct.**

Executed (signed) this                  day of                  20    .

Cindy I Young  
Signature(s) of Plaintiff(s) C